

# memorandum

DATE: July 1, 2020

REPLY TO  
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-745)

TO: Christopher Morse  
Supervisory Natural Resource Specialist – TFBV-DOB-1

**Proposed Action:** Vegetation Management along the St Johns – St Helens 115 kV and St Helens – Allston 115 kV Transmission Line Corridors

**Pollution Prevention and Abatement Project No.:** 4418

**Location:** Multnomah County and Columbia County, Oregon

**Description of the Proposal:** Bonneville Power Administration (BPA) proposes to clear unwanted vegetation in and adjacent to the transmission line corridors and access roads in the BPA Longview District. Vegetation Control Cut Sheets were created and compiled to address vegetation management needs in the following corridors:

- St. Johns – St. Helens 115 kV corridor, starting at mile 2, structure 3, and through mile 22, structure 4.
- St. Helens – Allston 115 kV corridor, beginning at mile 1, structure 1, and terminating at 23 mile, structure 7 south of the Allston substation.

The corridors in the proposed project area measure 100 feet in width and cross approximately 44 miles of terrain through private, non-profit (Columbia Land Trust), and local government (Metro, City of Rainier) residential and forested areas.

Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated. Any additional measures proposed by landowners or land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

To comply with Western Electricity Coordinating Council standards, BPA proposes to manage vegetation with the goal of removing tall-growing vegetation that is currently or will soon become a hazard to the transmission line (a hazard is defined as one or more branches, tops, and/or whole trees that could fall or grow into the minimum safety zone of the transmission line(s) causing an electrical arc, relay and/or outage). The overall goal of BPA is to establish low-growing plant communities along the right-of-way (ROW) to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods would be used to perform the work, and may include hand cutting, mowing, herbicidal treatment, or a

combination of those methods. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 2000), to ensure that the roots are killed - preventing new sprouts - and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure.

The proposed project would begin in August of 2020 and be completed by the end of September 2020. Approximately 1.7 miles of access roads would be cleared of vegetation, 71 acres of ROW would be manually cut, 67 trees within the corridors would be removed, 9 danger trees outside the corridor would be removed, 29 trees would be side limbed, 356 acres would have herbicide applied, and 42 structures would have vegetation around them removed. Debris would be disposed of using onsite chip, lop, and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

**Analysis:** Vegetation Control Cut Sheets were developed for these corridors that incorporate the requirements identified in BPA's Transmission System Vegetation Management Program FEIS and Record of Decision (August 23, 2000). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Cut Sheets.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Cut Sheets. As conservation and avoidance measures, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to the water's edge of any stream containing threatened or endangered species. Trees in riparian zones would be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag; other trees would be left in place or topped to preserved shade. Shrubs that are less than 10-feet-high would not be cut where ground to conductor clearance allows. No ground-disturbing vegetation management methods would be implemented, thus eliminating the risk for soil erosion and sedimentation near the streams. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the Vegetation Control Cut Sheets, no herbicide application would occur within a 50-foot radius of the wellhead, spring, or irrigation source (164 feet when using herbicides with ground/surface water advisory).

**Endangered Species Act and Magnuson-Stevens Act:** Pursuant to its obligations under the Endangered Species Act (ESA), BPA has made a determination of whether its proposed project would have any effects on any listed species. A species list was obtained for federally-listed, proposed, and candidate species potentially occurring within the project boundaries from the United States Fish and Wildlife Service (USFWS). Based on the ESA review conducted, BPA made a determination that the project would have "No Effect" for all ESA-listed species and designated critical habitat under USFWS' jurisdiction.

BPA conducted a review of ESA-listed species and Essential Fish Habitat (EFH) (as defined by the Magnuson-Stevens Act), under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). The proposed vegetation management activities are within the scope of activities and action area evaluated in the

*Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho* (SLOPES PBO) (WCR-2014-1600, September 22, 2016). Streams in the project area with documented presence of ESA-listed fish, designated as critical habitat for one or more species, and/or identified as Essential Fish Habitat (EFH) have been noted in the Vegetation Control Cut Sheets. It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

Cultural Resources: The proposed vegetation management actions would not result in ground disturbance to the physical environment, so the action is not one that typically has the potential to affect historic and/or cultural resources. If a site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist and the BPA archeologist would be contacted. Four cultural resource sites within the Captain Jack corridor were identified by the USFS, but they determined that the proposed project has no potential to affect these historic properties.

Re-Vegetation: Existing naturalized grasses and woody shrubs are present on the entire ROW and are expected to naturally seed into the areas that would have lightly-disturbed soil predominantly located on the ROW roads.

Monitoring: The entire project would be inspected during the work period, winter/spring 2020 through summer 2020. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

Findings: This Supplement Analysis finds that: (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Deepinder Sandhu

Natural Resource Specialist Student Trainee

CONCUR: /s/ Sarah T. Biegel      DATE: July 1, 2020

Sarah T. Biegel

NEPA Compliance Officer

References:

Vegetation Control Cut Sheets

Effects Determination

USFWS Letter of Concurrence (consultation code: 01EOFW00-2020-SLI-0471) dated 06/18/20